

LoryAnn Velez
1305 Dahlia Ct. #204
Carpinteria Ca, 93013

August 27, 2018

RE. Proposed Development at 755 and 711 Sand Point Rd.

To Board of Supervisors and Planning Commission of Santa Barbara County,

Hello, I am a Chumash community member and Vice Chair of a local Tribal organization. I am writing to address and express some concerns regarding the project's at and at 755 and 711 Sand Point Rd on cultural resource sensitivity and biological resources associated within area of Carpinteria Salt Marsh. It has been well-established by environmental scientists from UCSB that the Carpinteria salt marsh is an important coastal wetland system and "Environmentally sensitive habitat area" or ESHA. The coastal zone of Santa Barbara County, including the Carpinteria Salt Marsh and sites of where these two developments, has a world class biological and cultural resources. I gave my concerns about the need for additional evaluation and protection of cultural resources of the Carpinteria Salt Marsh and the project sites. There has not been sufficient testing for Cultural Resources in the area. A phase 1 survey is not able to detect below-ground resources and thus, doesn't confirm there are no Native American cultural resources present. Not only the project site experienced protracted periods of occupation, but the entire Carpinteria Salt Marsh constitutes a tribal Cultural resources that must be considered and protected.

The Coastal Act and AB-52 justify the further studies on these projects to identify, qualify and consider protection strategies of Cultural resources. Further analysis is important and needs to be investigated within Chapter 3 of the Coastal Act (Public Resources Code §§30200 – 30265.5). Under these provisions, the Commission has the authority and duty to regulate development in a manner that protects and/or mitigates impacts to specific resources, including archaeological and paleontological resources (§30244), natural landforms (§§ 30235, 30251, 30253), water quality and biological resources (§§30230, 30231, 30233, 30240), and public access (§§ 30210-30214).

When acting on coastal development permits, the Commission may also consider environmental justice. Loss of access from unpermitted revetment starves the beach and constraints access by members of the public and descendants and members and members of the Chumash Community.

Under AB-52, Tribal Cultural Resources (archeological and biological resources of significance to First people and descendants of area) should be recognized and protected pursuant to the Coastal Act. Furthermore, Tribal Cultural Resources can also qualify as resources that the Commission is authorized and can required to protect under Chapter 3 of the Coastal Act. In other words, protection of Tribal Cultural Resources can occur through protection of natural landforms.

The South Coast area of Santa Barbara County is one of the most important archaeological regions in California. This area was densely occupied by the Chumash at the time of Spanish contact, and archaeological evidence confirms that it was so occupied for a considerable period of time. Site density in the area is estimated to be very high, although it has not been systematically surveyed. An estimated 90 percent of the remaining sites directly on the coast have been recorded, chiefly by D. B. Rogers in 1929. Areas just a few hundred yards away from the coast are not as well-known, although they are also believed to contain a high density of sites. These are the many important concerns that has surfaced within Tribal Cultural Resource assessment under AB-52 and needs to be address with further study and treatment. i encourage both the Bord and Planning Commision to reject these two projects and direct staff and the applicant to work with local Chumash Representative to assess both projects specific impacts and impacts to tribal cultural resources of the Carpinteria Salt Marsh.

Sincerely,

LoryAnn Velez